

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL  
PARK, LLC, and

TIGER KING, LLC,

*Defendants.*

Case No. 6:20-cv-00423-JFH

**UNITED STATES' NOTICE OF DISMISSAL OF CLAIMS AGAINST JEFFREY AND  
LAUREN LOWE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1), Plaintiff the United States hereby provides notice of its voluntary dismissal of the claims raised in the Complaint against Defendants Jeffrey Lowe and Lauren Lowe ("the Lowes").

On November 19, 2020, the United States filed the Complaint in this civil enforcement action, raising claims under the Endangered Species Act and Animal Welfare Act against the Lowes, Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC. Dkt. 2. On December 23, 2021, the Court approved and entered a Consent Decree between the United States and the Lowes resolving the claims raised against the Lowes in this action. Dkt. 156. In the Consent Decree, the United States and the Lowes agreed that the United States would dismiss all claims against the Lowes within seven days of the Court's entry of the Consent Decree. Dkt. 155 at 7. In accordance with the Consent Decree, the Court ordered the United States to move to

dismiss the claims against the Lowes by January 6, 2021. Dkt. 156. Also on December 23, 2021, the Court granted the United States' motion for default judgment and issued a declaratory and default judgment against Defendants Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC, for failure to file a timely answer to the Complaint and failure to obtain counsel. Dkt. 157, 158.

Pursuant to Federal Rule of Civil Procedure 41(a)(1), a plaintiff may voluntarily dismiss claims without a court order if the defendant has not yet served an answer or motion for summary judgment or if the parties have signed a stipulation of dismissal. In this litigation, the Lowes have never filed an answer or a motion for summary judgment. Therefore, this notice serves to voluntarily dismiss the claims in the Complaint as raised against the Lowes.<sup>1</sup> The remainder of the Complaint has been resolved by the Court's entry of a default judgment against Defendants Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC.

DATED: December 29, 2021

Respectfully Submitted,

TODD KIM  
Assistant Attorney General  
Environment and Natural Resources Division

/s/ Devon Lea Flanagan  
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<sup>1</sup> Should the Court find a motion to dismiss necessary in these circumstances, *see* Dkt. 156, the United States alternatively moves to dismiss the claims against the Lowes pursuant to Federal Rule of Civil Procedure 41(a)(2). As expressed in the Consent Decree, the Lowes do not oppose the United States' dismissal of these claims.

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